

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Review of Part 15 and other Parts of the Commission's Rules) ET Docket No. 01-278
) RM-9375
) RM-10051

To: The Commission

**REPLY COMMENTS OF THE INDIANA REPEATER COUNCIL, INC. (IRC) IN
RESPONSE TO DOCKET NO. 01-278**

The Indiana Repeater Council Inc.

The Indiana Repeater Council, Inc. (IRC) is the recognized Amateur Radio repeater coordinator for Indiana. The IRC is responsible for coordinating Amateur Radio repeaters in a manner that not only minimizes interference between repeaters but also minimizes interference to other types of Amateur Radio systems including weak signal experimentation, satellite operation and Amateur Television.

IRC Opposes RM -10051

The Indiana Repeater Council (IRC) on behalf of our members and licensed Indiana Radio Amateurs hereby goes on record as being vigorously opposed to (RM-10051) a proposal by SAVI Technologies that is part of ET Docket 01-278. SAVI proposes increasing the radiation level and duty cycle of radio frequency identification systems (RFID) in the 70-Cm Band. This will result in serious interference to licensed Amateur Radio Service (ARS) operations that operate in the 70-Cm band.

Discussion

The 70-Cm (ARS) band is the fastest growing Amateur Radio band in the US. In much of Indiana this band is reaching full capacity. Beside the 140 repeaters that are coordinated on this band in Indiana, there exists a great deal of weak signal activity, propagation research, satellite operation, and Amateur television (ATV) operation. Many Radio Amateurs operate point to point links in this frequency range.

Of particular concern is interference to weak signal research, propagation studies and satellite communications. Amateur television and point to point links that facilitate repeater operation will also be seriously and adversely affected. All of these systems operate on or very near the frequency range addressed in the SAVI proposal.

For weak signal operation, propagation studies, and satellite operation, very sensitive receiving systems must be used. Recent technology has made it possible for Radio Amateurs to hear very minute signals. The cumulative and transient nature of the devices proposed would result in serious degradation of these systems, and make weak signal operation and propagation studies impossible.

Amateur television operation is conducted near this portion of the 440 band. Because of the wide bandwidth of standard format television, the bandpass of the user's receiver covers the same frequencies addressed in this proposal when receiving Amateur Television signals. While commercial television stations run hundreds of thousands of watts, Radio Amateurs typically use 10 to 100 watts spread over the 6 MHz bandpass of a

video signal. Amateur television receivers must be much more sensitive than standard television broadcast receivers and use higher and more sensitive antennas. Video is amplitude modulated further worsening the likelihood of interference. If this proposal were granted, Amateur Television would be degraded or rendered entirely unusable.

Point to point link receivers and repeater receivers are also quite sensitive permitting use of relatively low transmitter power resulting in efficient operation with less interference between systems. These systems will be affected by interference that cannot be avoided because of the transient nature of these proposed devices.

With today's sensitive receivers, Amateurs are experiencing problems with even the current limitations. For example, Radio Amateurs have had problems in the 70-Cm band with wireless car alarms and radiation from Delco car radios.

It should be noted that Amateur Radio satellite communications, Amateur Television and weak signal experimentation is being used in High Schools and Junior High Schools by teachers who are licensed Radio Amateurs to develop an interest by their students in technology.

Conclusion

Little if any consideration has been given by the petitioner (SAVI Technologies) of the impact that this proposal will have on the licensed users of this part of the 70 – Cm band. The Indiana Repeater Council vigorously requests that the FCC dismiss RM-10051 the

portion of this docket regarding RFID systems on 70-Cm. This proposal is lacking in technical merit because the result will be very harmful interference to the licensed users of this spectrum, particularly Radio Amateurs.

Respectfully submitted,

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